

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

Spottswood W. Robinson III and Robert R. Mehri Jr.
Federal Courthouse, 701 East Broad Street Richmond, Virginia 23219

GREGORY A. E. WALKER

Plaintiffs,

v.

Civil Action No. **3:21-cv-00143-HEH**

JAMES HILL

8553 Meadowbridge Road
Mechanicsville, Virginia 23116-0000

and

HILL MANAGEMENT, LLC

Please Serve:

James Hill

8553 Meadowbridge Road
Mechanicsville, Virginia 23116-0000
Registered Agent,

COMPLAINT

Gregory A E. Walker (“Walker”), by counsel, sets forth to the Court the following:

Jurisdiction

1. This Court has jurisdiction under the provisions of 15 U.S.C. § 1639(b), and 28 U.S.C. § 1331.

Parties

2. Walker is a natural person who resides in his home “the home”) located at 16148 Buckfast Place, Beaverdam, Virginia 23015 in Hanover County, Virginia.
3. James Hill is a natural person who resides in the Commonwealth of Virginia.
4. Hill Management, LLC (“Hill Management”) is a for-profit Virginia corporation.

Venue

5. Venue is proper in the Court because James Hill as individual defendant and as registered agent for Hill Management, resides in and is located within the U.S. District Court for the Eastern District of Virginia, Richmond Division

Facts

6. In April 2018, Mechanicsville Holdings, LLC (“Mechanicsville Holdings”) sold to Walker and Christina Burkhead (“Burkhead”) a residence (“the residence”) located at 11402 Pinhook Road, Rockville, Virginia 23148 in Hanover County, Virginia.
7. Pursuant to such sale, Mechanicsville Holdings executed a deed conveying ownership of the residence to Walker and Burkhead and, by agency, caused the said deed to be delivered to Walker and Burkhead.
8. Pursuant to such sale, the said deed was recorded in the Clerk’s Office of this Court (“the public land records”) and resulted in Walker and Burkhead becoming the record owners of the residence.
9. In order to obtain funds towards the purchase price for such sale, there was a necessity to obtain a loan.
10. James Hill’s daughter, Sharon Hill, made a \$280,000 mortgage loan (“the loan”) to Walker, which was evidenced by a purchase money note (“the note”) signed by Walker.
11. The note was secured by a deed of trust (“the deed of trust”) signed by Walker and Burkhead which was recorded in the public land records of the Clerk’s office of this Court.
12. On information and belief, the loan was a federally related loan because Sharon Hill made loans in the applicable year of more than one million dollars,

13. James Hill and Hill Management were both “mortgage originators” as to the loan under the applicable provisions of the federal Dodd-Frank Act, 15 U.S.C. § 1639(b) (“Dodd-Frank”).
14. Under the provisions of Dodd-Frank, James Hill and Hill Management were required to be licensed as mortgage originators.
15. Neither James Hill nor Hill Management were licensed as mortgage originators.
16. In failing to obtain licensure as mortgage originators, James Hill and Hill Management breached Dodd-Frank.
17. As a proximate result of such breach of Dodd-Frank by James Hill and Hill Management, Walker sustained and will sustain the following damages:
 - A. He was required to pay a “loan origination fee” to Hill Management for \$5,600.
 - B. He lost the interest on that \$5,600.
 - C. He will continue to lose such interest in the future.

Call for Trial by Jury

18. Gregory Walker calls for trial by jury of this case.

Conclusion

Wherefore, Gregory Walker prays that the Court enter a judgment in his favor against James Hill and Hill Management for compensatory damages and attorney’s fees.

Respectfully submitted,

GREGORY A. E. WALKER

By /s/ Henry W McLaughlin
Counsel

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